

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JOHN COTTAM,

Plaintiffs,

16-cv-4584 (AJN)(SN)

-against-

**STIPULATION OF
DISMISSAL WITH
PREJUDICE**

6D GLOBAL TECHNOLOGIES, INC., and
6D ACQUISITIONS, INC.,

Defendants.
-----X

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned parties,
that:

1. Defendants 6D Global Technologies, Inc. and 6D Acquisitions, Inc., and Third-Party Defendants John Hurst, Daniel Larson, Roger Klein, Global Investment Alliance, Inc. and Early Bird Tech Limited, have settled all the claims and counterclaims against each other in this case.

2. Therefore, pursuant to Federal Rules of Civil Procedure 21 and 41, the undersigned settling parties (the "Settling Parties") hereby stipulate that: (a) the Third Party Complaint at Doc. 68 is dismissed with prejudice with respect to Third-Party Defendants John Hurst, Daniel Larson, Roger Klein, Global Investment Alliance, Inc. and Early Bird Tech Limited; (b) the Counterclaims of John Hurst (Doc. 147), Daniel Larson (Doc. 145), Roger Klein (Doc. 166), Global Investment Alliance, Inc. (Doc. 162) and Early Bird Tech Limited (Doc. 162) are all dismissed with prejudice; and (c) Third Party Defendants John Hurst, Daniel Larson, Roger Klein, Global Investment Alliance, Inc. and Early Bird Tech Limited shall be terminated from this action.

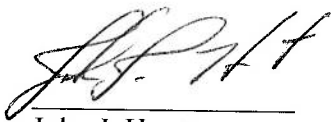
3. This stipulation may be executed in counterparts and that electronic signatures may be accepted as originals for all purposes.

4. This Stipulation is So Ordered, and the Clerk of the Court is hereby directed to terminate Third Party Defendants John Hurst, Daniel Larson, Roger Klein, Global Investment Alliance, Inc. and Early Bird Tech Limited from this Action.

Dated: October 29, 2020
New York, New York

CATAFAGO FINI LLP

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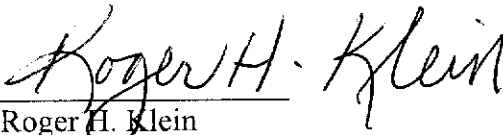
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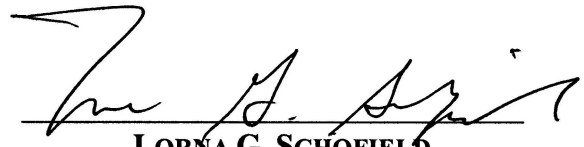
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So Ordered.

Dated: November 2, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE